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23 UNITED STATES DISTRICT COURT
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF
27 GOVERNMENT EMPLOYEES, AFL-CIO, et
28 al.,

29 Plaintiffs,

30 v.
31 DONALD J. TRUMP, in his official capacity
32 as President of the United States, et al.,

33 Defendants.

34 Case No. 3:25-cv-03698-SI

35 **DECLARATION OF ELIZABETH
36 TURNER-NICHOLS**

DECLARATION OF ELIZABETH TURNER-NICHOLS

I, Elizabeth Turner-Nichols, declare the following under penalties of perjury:

1. I am over 18 years of age and competent to provide this declaration. This declaration is based on my personal knowledge, information, and belief. I am providing this declaration in my capacity as a union president.

6 2. I am the President of the American Federation of Government Employees, Local
7 2110 (“AFGE Local 2110”), a labor organization that represents approximately 5,000 government
8 employees who are employed by the Department of Veterans Affairs (“VA”) at the VA Palo Alto
9 Health Care System including Menlo Park and Livermore Divisions, as well as several
10 Community-Based Outpatient Clinics in Fremont, San Jose, Monterey, and Capitola. Additionally,
11 I am the 12th District Representative of the National VA Council #263 representing multiple
12 Locals, including: VA Local 1216 (San Francisco), VA Local 1061 (Los Angeles), VA Local
13 1206 (Sacramento), VA and VBA Local 1224 (Las Vegas), VA Local 2654 (Fresno), VA and
14 VBA Local 2152 (Reno); VBA Local 1201 (San Diego), VBA Local 1159 (Oakland), NCA Local
15 3723 (Fallbrook), and NCA Local 3854 (Riverside).

16 3. AFGE Local 2110 advocates for the rights, safety, and fair treatment of the
17 employees it represents, serving as their officially recognized exclusive representative. Our core
18 functions include providing guidance and resources to bargaining unit employees.

19 4. Core functions of the Union include filing and negotiating grievances against the
20 VA to enforce the terms and conditions of the collective bargaining agreement (“CBA”); pursuing
21 arbitrations on behalf of workers to enforce the CBA; and providing other support, guidance, and
22 resources to bargaining unit employees.

23 5. AFGE Local 2110 currently has approximately 1,626 members, with membership
24 being voluntary. AFGE Local 2110's operations are funded through voluntary dues paid by
25 members.

26 6. AFGE Local 2110 first became aware of President Trump's plan to conduct "large-
27 scale" RIFs through the February 11, 2025, Executive Order. Prior to that time, no one from the
28 VA had said anything about large-scale RIFs. However, given the earlier terminations of

1 probationary employees across the VA, there had been speculations that this was the initiation of a
2 RIF.

3 7. According to the VA's Agency Reduction in Force (RIF) and Reorganization Plan
4 (ARRP)" ("ARRP Memorandum"), which is dated March 4, 2025 and attached hereto as Exhibit
5 A, "the Department's initial objective is to return to our 2019 end-strength numbers of 399,957
6 employees." The VA currently employs roughly 480,000 employees, so this objective requires
7 terminating roughly 80,000 VA employees.

8 8. The timeline for implementation of the RIFs has shifted repeatedly. Originally, the
9 ARRP proposed layoffs beginning in August; however, various news articles have since reported
10 that later plans have included layoffs beginning as early as June or July. Articles from KTNV Las
11 Vegas, describing layoffs beginning in July, and Rolling Stone, discussing plans for layoffs in
12 June, are attached hereto as Exhibit B. In my opinion, such rapid movement on a RIF process is
13 unprecedented. This speed of implementation for a RIF is unprecedented in my 35-year
14 experience at the VA.

15 9. News articles, including the KTNV Las Vegas article in Exhibit B, have reported
16 that the RIFs will focus on cuts to various administrative and support roles as well as medical and
17 healthcare support staff.

18 10. The ARRP memorandum and widespread media reports on the VA's restructuring
19 efforts have caused significant fear and anxiety among AFGE Local 2110's members and
20 leadership. Some bargaining unit employees have relocated their families to the Bay Area, from
21 various states, to accept positions with the VA and now are waiting to see if they will find
22 themselves unemployed. Also, many employees who have been with the VA for years are now
23 worried that they will be forced out and left without income and health care coverage for
24 themselves and their families.

25 11. In response to the RIF plan, AFGE Local 2110 has devoted substantial resources to
26 responding to requests from our members and providing guidance about the upcoming RIFs,
27 despite the lack of specific information we are receiving from the VA. Many members, fearing
28 that their position will be included in the 80,000-employee cuts understandably have been asking

1 the union questions—by email, in person, and by phone—about the impact of these actions on
2 their rights. Addressing this overwhelming demand has diverted critical resources from other
3 union priorities.

4 12. AFGE Local 2110 will likely lose hundreds of members under a RIF plan that cuts
5 more than 15% of VA employees nationwide. This will cause immediate harm to those members
6 who will lose their income and benefits, including health care.

7 13. These terminations will also cause financial and operational harm to the Union
8 itself. The removal of AFGE Local 2110 members from federal employment will significantly
9 weaken the union’s bargaining power in future negotiations, as bargaining strength is directly tied
10 to the number of employees represented. Further, the Union’s activities are funded through
11 members’ voluntary dues. If the Union no longer receives dues from the hundreds of members
12 who are being laid off, that will make it significantly more difficult for the Union to continue to
13 function and to fulfill its mission to advocate for the rights, safety, and fair treatment of the
14 employees it represents. These losses will have a direct impact on the union’s financial stability
15 and its ability to provide essential services to both members and affiliates.

16 14. The implementation of the cuts described in the ARRP memorandum will also have
17 severe consequences limiting the ability of AFGE Local 2110 members to perform the core
18 functions of the VA and will have catastrophic consequences for veterans’ access to care.

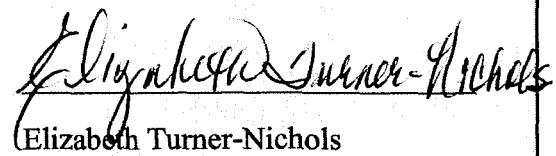
19 15. The collective efforts of every staff member, whether on the front lines of patient
20 care, behind the scenes in administrative support, or advancing innovative research, form the
21 backbone of a system that veterans trust. *Every* non-supervisory employee at VA Palo Alto
22 Health Care System and the Community-Based Outpatient Clinics, identified above, is represented
23 by AFGE Local 2110. These employees include doctors, nurses, emergency medical services
24 personnel, food service workers, custodial staff, and administrative staff—all of which perform
25 functions critical to successfully delivering services to the veterans they serve. For example, cuts
26 to administrative positions reduce the availability of personnel to handle phone calls from veterans
27 who need to access care and to provide other essential services.

28

1 16. The VA Palo Alto Health Care System, along with many other VA clinics and
 2 health care systems, is already short-staffed relative to the need for its services. Cuts to 15% of
 3 positions will strain many components of the VA to the breaking point. These terminations also
 4 put additional burdens on the remaining employees to juggle their own positions while performing
 5 new data management, custodial, or administrative tasks that were previously carried out by
 6 terminated employees. These burdens not only disrupt the lives and work of our colleagues—
 7 many of whom are veterans themselves—but also jeopardize the quality of care and support that
 8 veterans in our community rely on every day.

9 17. This pending RIF has already introduced uncertainty, lowered morale, and
 10 disrupted teams that have worked diligently through the most demanding times—especially during
 11 the pandemic and PACT Act implementation. These actions undermine AFGE Local 2110's
 12 mission of ensuring dignity, safety, and fairness in employment for the workers it represents, and
 13 disrupt the stability necessary to provide consistent, compassionate, and high-quality care
 14 throughout the VA.

15 I declare under penalty of perjury under the laws of the United States that the foregoing is
 16 true and correct. Executed April 28, 2025, in Palo Alto, California.

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Elizabeth Turner-Nichols

Exhibit A

**Department of
Veterans Affairs****Memorandum**

Date: March 4, 2025

From: Chief of Staff (00A)

Subj: Department of Veterans Affairs Agency Reduction in Force (RIF) and Reorganization Plan (ARRP) (VIEWS 12864784)

To: Under Secretaries, Assistant Secretaries, and Other Key Officials

1. This memorandum initiates the Department of Veterans Affairs (VA) Department-wide review of mission, organization, and structure in order to achieve efficiencies dictated by President Trump's February 11, 2025, Executive Order Implementing the President's "Department of Government Efficiency" (DOGE) Workforce Optimization Initiative (Workforce Optimization) and the subsequent February 26, 2025, Office of Personnel Management (OPM) and Office of Management and Budget (OMB) guidance document on RIF and Reorganization Plans. VA, in partnership with our DOGE leads, will move out aggressively, while taking a pragmatic and disciplined approach to identify and eliminate waste, reduce management and bureaucracy, reduce footprint, and increase workforce efficiency. Additionally, a portion of the savings garnered will be reinvested in the Veterans we serve and the systems required to support our workforce and execute our mission. Following a thorough review of mission and structure, the Department will affect a VA-wide RIF in August to resize and tailor the workforce to the mission and revised structure.

2. This effort will require the entirety of VA staff and organizations to work together in a collaborative fashion, as well as to coordinate actions with DOGE and the Administration as a whole, to achieve the desired results within the allotted time. For planning purposes, the Department's initial objective is to return to our 2019 end-strength numbers of 399,957 employees. Furthermore, VA Administrations and Staff Offices will need to detail sufficient personnel to support this effort as outlined in this memorandum to focus on implementation and to synergize VA efforts.

3. Implementation Timeline.

a. Information Gathering (due March 10, 2025): Administrations and Staff Offices will gather required information as outlined in Attachment 1. Additionally, a separate memorandum on RIF procedures will be released, which will include required information and actions.

b. Line of Effort (LOE) 1: Administrations and Staff Offices will conduct an internal review and analysis of their organizations with required products to be delivered by April 10, 2025, to provide responses to OMB and OPM Phase 2 requirements by April 14, 2025.

Page 2.

Subj: Department of Veterans Affairs Agency Reduction in Force and Reorganization Plan (ARRP) (VIEWS 12864784)

- c. LOE 2 (Intra-Department): A Department-wide review will be completed by May 9, 2025.
- d. VA will publish its Reorganization Plan in June 2025 with a subsequent Department-wide RIF prior to the end of fiscal year 2025, as required by OMB and OPM.
- e. Throughout all phases of the operation, there will be ongoing reviews and interim briefings and decision points. Additional implementation guidance is forthcoming.

4. Program Implementation.

- a. VA Reorganization Implementation Cell (VA RIC): The Office of Human Resources and Administration/Operations, Security, and Preparedness (HRA/OSP) will stand-up the VA RIC to serve as the program manager and focus on implementation actions. The VA RIC will expand to execute necessary functions for the reorganization. The following Administrations and Staff Offices are required to detail a minimum of one individual at a grade level of General Schedule-14 or higher to support the VA RIC activities and serve as the liaison to their organization: Veterans Health Administration, Veterans Benefits Administration, National Cemetery Administration, HRA/OSP, Office of Information Technology, Office of Acquisition, Logistics, and Construction, Office of Enterprise Integration, Office of General Counsel, Office of Management, and Board of Veterans' Appeals. Name(s) should be submitted to VACO006FrontOfficeActions@va.gov by March 5, 2025. The start date will commence on March 6, 2025 (location will be provided by March 5). Initial details will be for a period of 120 days. In addition, VA liaisons to DOGE will be integrated into VA RIC operations ensuring positive and continuous communications with the Administration through all phases of the operation.
- b. Administrations and Staff Offices will designate a senior leader (Senior Executive Service level) to serve as a central point of contact for time sensitive issues, or where senior-level contact is needed to resolve issues. Name(s) should be submitted to VACO006FrontOfficeActions@va.gov by March 5, 2025.
- c. Under Secretaries, Assistant Secretaries, and other Key Officials will serve on the Executive Review Group (ERG). Membership will also include Senior Advisors and VA DOGE liaisons. The ERG will address issues and make recommendations to the Secretary for decision. The Secretary or his designee will chair the ERG.

Page 3.

Subj: Department of Veterans Affairs Agency Reduction in Force and Reorganization Plan (ARRP) (VIEWS 12864784)

5. The Secretary will chair an initial senior level meeting on March 5, 2025. Invitation is forthcoming.



Christopher D. Syrek

Attachment

Attachment

**Initial Data Call - Information/Data Gathering
(February 28 – March 10)**

- Provision of Organization Charts and Structures for all organizations down to lowest level.
- Provision of unit manpower documents by organization.
- List of statutorily mandated functions / entities – certification that these have been interpreted to cover only what functions they explicitly require.
- List of regulatory directed functions.
- List of organizations and total number of positions:
 - That provide direct service to Veterans;
 - That support operations; and
 - Those that are management overhead.
- List of positions:
 - Essential positions that excluded from potential reduction / RIF; and
 - NOT mandated as essential during a lapse in appropriations (using the Agency Contingency Plans submitted to OMB in 2019).
- Installations: List of installations across the Department with assigned personnel and capacity (excess).
- Technology/Systems: Identification of all systems utilized by the Department for its mission to include costs, contract, and associated personnel.
- Initial input of any identified organization, unit, or mission should be eliminated or consolidated; and which specific subcomponents or functions, if any, should be expanded to deliver on the President's priorities.
- The suggested plan for Congressional engagement to gather input and agreement on major restructuring efforts and the movement of fundings between accounts, as applicable, including compliance with any Congressional notification requirements.

Additional implementation guidance is forthcoming.

Exhibit B

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LAS VEGAS

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LOCAL NEWS



As concerns among veterans rise, VA source shares details of workforce reduction plan

While the VA assures that veterans will not see any disruptions in care, organizations in Las Vegas are bracing for potential ripple effects.

Posted 7:40 PM, Apr 09, 2025 and last updated 11:26 AM, Apr 11, 2025



By: Alyssa Bethencourt



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Photo by: Shutterstock

Department of Veterans Affairs sign.

Editor's note: We continue to follow this story on Thursday after receiving an email from the Department of Veterans Affairs claiming the document cited in this reporting is "fraudulent."

It has been widely reported and verified that 80,000 jobs are being reduced from the VA workforce nationwide. Our reporting includes information from a source with direct knowledge of the department's plans that outlined how those decisions would be made and which jobs would be impacted.

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▷ :

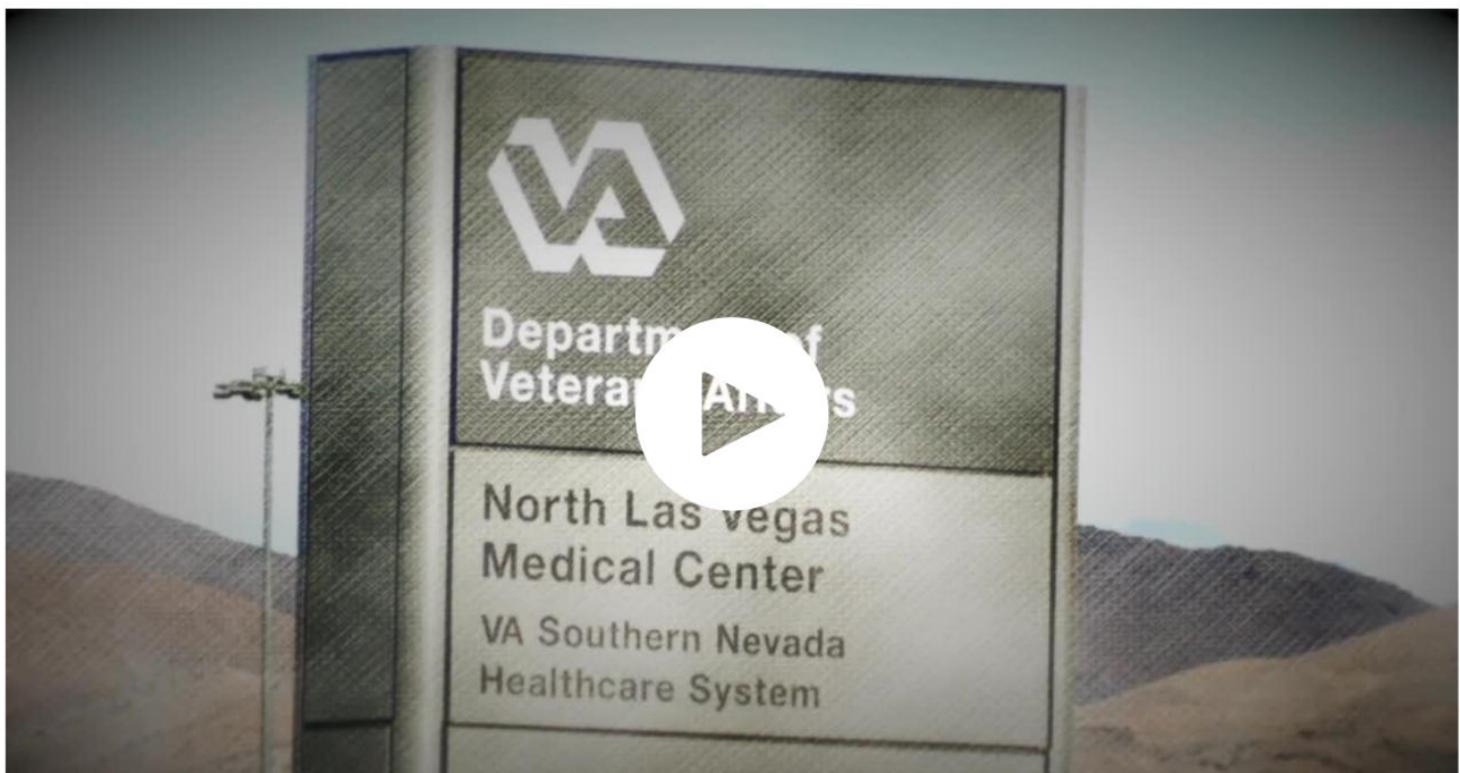
A department spokesperson reached out to Channel 13 in response to this reporting, writing in an email that the information we received came from a "fraudulent and intentionally false leaked document."

We followed up with the VA to ask what they mean by "fraudulent" and to ask that they provide further details and proof of that claim. VA press secretary Pete Kasperowicz responded with this statement:

This story is based on a fraudulent and intentionally false leaked document that does not reflect VA's reform plan, which is still being developed. It does not come from anyone involved in VA's plan. By describing this as part of "the department's plans," KTNV is spreading disinformation and creating unwarranted fears around our efforts to make VA work better for Veterans, families, caregivers and survivors.

LAS VEGAS (KTNV) — A shake-up is underway at the Department of Veterans Affairs (VA), with a nationwide workforce reduction plan set to [impact more than 80,000 employees](#). While the VA assures that veterans will not see any disruptions in care, local organizations in Las Vegas are bracing for the ripple effects of these job cuts.

VIDEO | How the workforce reduction plan could impact veterans in Nevada



Nationwide Workforce Reduction

According to information shared with Channel 13 on March 28, the VA's workforce reduction plan will unfold in three phases through the end of the year. Internal documents obtained by Channel 13 reveal the following timeline for the cuts:

1. Administrative and Support Roles:

- Policy and program analysts
- HR personnel
- IT support staff in non-critical functions
- Clerical and data entry positions

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2. Medical and Healthcare Support Staff:

- Non-patient-facing administrative healthcare roles
- Some contract positions in VA medical centers
- Certain research positions with reduced funding

3. Regional and Central Office Staff:

- Veterans Affairs Central Office (VACO) will see cuts in operational, administrative, and policy roles
- Reductions in public affairs, strategic planning, and some procurement functions

4. Field Office and Call Center Reductions:

- VA call centers are expected to be streamlined with automation, reducing the need for live agents
- Some regional field office roles will be merged or reassigned

Phase 1: Initial Announcements & Voluntary Exits (March - June 2025)

March 2025:

- Official announcement of the workforce reduction plan
- Internal communications sent to department heads outlining impact areas
- Voluntary Separation Incentives (VSIP) and Early Retirement (VERA) programs launched
- Hiring freeze implemented for affected roles

April - May 2025:

- Departments identify specific employees ADVERTISEMENT at risk and begin individual consultations
- Voluntary retirements and separations processed

- Workforce retraining programs introduced for employees willing to transition into alternative roles

June 2025:

- VA finalizes the list of employees subject to layoffs if voluntary separations are insufficient
- Notifications sent to impacted employees
- First reallocation of duties for remaining staff

Phase 2: First Wave of Layoffs & Adjustments (July - September 2025)

July 2025:

- First round of layoffs begins, mainly targeting administrative and non-essential roles
- VA implements staffing reassessments where feasible
- Employee transition programs start, helping affected workers seek other federal employment

August 2025:

- Impact assessment conducted to evaluate service disruptions
- VA adjusts remaining workforce allocation to prevent disruptions in veteran-facing services

September 2025:

- Second round of layoffs begins, primarily affecting regional and central office staff
- Automation systems deployed, reducing demand for certain clerical and customer service roles

Phase 3: Final Adjustments & Transition (October - December 2025)

October - November 2025:

- VA monitors post-reduction service efficiency and adjusts workloads as necessary
- Final efforts to reallocate displaced employees to other government roles

December 2025:

- Completion of the RIF plan
- Final workforce adjustments and long-term strategy development for maintaining efficiency with fewer employees
- The plan covers a wide range of positions, from administration and IT to HR and call centers. While the VA insists that direct care roles will be spared, many worry that the ripple effects will still be felt on the ground, especially in local programs that serve veterans

Local Impact: What it means for veterans in Las Vegas

In Las Vegas, the local impact is already being felt. Programs that assist veterans, like [Forgotten Not Gone](#), are grappling with the uncertainty these cuts bring. The nonprofit organization, which has been offering free specially-designed trikes to local veterans for over a decade, is concerned that the reduction in VA staff could lead to funding shortfalls and more limited services.

"A lot of my veterans were really panicking, and we're feeling it now," said founder Kelley Guidry.

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The organization fills critical gaps, especially in areas where government support falls short. However, the organization has already faced financial struggles after their City

of North Las Vegas grant ended in September. Now, with funding cuts on the horizon, they're uncertain if their planned government grant from the VA will ever come through.

"I've just been paying \$10,000 a month, trying to garner community support, and trying not to interrupt my veterans," Guidry said, adding that her primary focus is preventing veterans from feeling the pressure, even though they already are.

VA's Statement on the Workforce Reduction

In response to concerns, the VA issued a statement to Channel 13, emphasizing that the agency is focused on "reducing bureaucracy" rather than cutting services for veterans.

VA will run through a deliberative process and find ways to improve care and benefits for Veterans without cutting care and benefits for Veterans.

We're not talking about reducing medical staff or claims processors, we're talking about reducing bureaucracy and inefficiencies that are getting in the way of customer convenience and service to veterans.

Meanwhile, all VA mission-critical positions are exempt from cuts, and hiring continues for [more than 300,000 essential positions](#).

When pressed about the potential for service delays, wait times, and local impact, the VA declined to offer further comments.

The Uncertainty Facing Providers

For providers like Forgotten Not Gone, the situation remains precarious. Guidry, who has been shouldering the organization's financial burden, fears that the cuts will only make things worse.

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"We don't have overhead, we don't have funding and it's only going to get worse," she said.



SUPPORT OUR TROOPS?

MASS LAYOFFS AT THE VETERANS ADMINISTRATION TO BEGIN IN JUNE: REPORT

A leaked memo reveals the department is planning for a significant reduction in force

By PETER WADE

MARCH 9, 2025



Donald Trump at the White House in Washington, D.C., on March 3, 2025.

ROBERTO SCHMIDT/GETTY IMAGES

The Veterans Administration (VA) is planning for mass layoffs that will start in June, according to Reuters, which reviewed an internal government memo.

The March 6 memo instructs the VA's human resources department to review agency operations by June. Once the review is complete, "VA will initiate Department-wide RIF actions," referring to a reduction in force.

At least 25 percent of the VA's 470,000 employees are veterans, so approximately 20,000 veterans could lose their federal employment if the agency cuts more than 80,000 jobs as planned. Last month the VA laid off 2,400 federal employees.

Veterans Affairs Secretary Doug Collins told veterans that change would be coming, "so get used to it" in a video posted to X (formerly Twitter) and emailed to veterans.

"Right now, VA's biggest problem is that its bureaucracy and inefficiencies are getting in the way of customer convenience and service to veterans," Collins said last week. The VA has long been known for making veterans wait long periods of time before they can receive health care, although that has improved over recent years. The Biden administration hired tens of thousands of new VA employees, including 61,000 in fiscal year 2023 alone. It is unclear how laying off a quarter of the workforce would make the issue of long wait periods or other inefficiencies any better.

Billionaire Elon Musk, who is leading Trump's so-called Department of Government Efficiency, has already made deep cuts to the federal workforce, reducing the number of employees by around 100,000 through layoffs and promises of buyouts.

Alina Habba, a close Trump ally and counselor to the president, had harsh words for veterans March 4, saying some laid-off vets may not be "fit to have a

job ... or willing to come to work.”

“We have a fiscal responsibility to use taxpayer dollars to pay people that actually work,” Habba said. “That doesn’t mean that we forget our veterans by any means. We are going to care for them in the right way, but perhaps they’re not fit to have a job at this moment or not willing to come to work.”

TRENDING STORIES

- 1. 12,000 Years Later, Dire Wolves Are Back**
- 2. Drummer Clem Burke, the 'Heartbeat of Blondie,' Dead at 70**
- 3. Massive Protests Against Trump Are Just the Beginning**
- 4. 'It's Funny How People Are Intimidated by Him': Daryl Hannah on Her New Neil Young Doc and More**

A veteran who works for the VA as a therapist told The War Horse he is scared for his future: “The last time I felt this level of fear was in combat.”

“At least in combat, I knew my mission. I was supported in it by my teammates, by my leadership, and I had agency. I had a weapon. I could fight against a tangible enemy,” he said. “Now it’s just an invisible cloud of dread.”

IN THIS ARTICLE: DOGE, DONALD TRUMP, VETERANS, VETERANS ADMINISTRATION

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